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February 10, 2005

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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Ex Parte – Petition for Declaratory Ruling of Puerto Rico Telephone Co.,
CC Docket No. 95-116

Dear Ms. Dortch:

This letter is to provide notice of an ex parte meeting that took place yesterday in the above-referenced matter. Gregory Vogt, Joshua Turner, and the undersigned on behalf of Puerto Rico Telephone Co. (“PRT”) met with Cheryl Callahan, Narda Jones, Pam Slipakoff, Jeffrey Williams, and Sanford Williams of the Commission to discuss PRT’s Petition requesting a declaratory ruling that an Order issued by the Telecommunications Regulatory Board of Puerto Rico (“Board”) requiring PRT to maintain reverse toll billing is preempted by federal administrative and statutory law.

During the meeting, we summarized the points made in PRT’s Petition, Reply Comments, and ex parte filing. Specifically, we explained that if PRT complies to the extent possible with the Board’s Order and retains reverse toll billing on those NPA-NXXs that were originally assigned to wireless carriers, those customers who port wireline numbers to wireless carriers (and those wireless customers who receive a number in a formerly wireline NPA-NXX because of pooling) will not receive reverse toll billing, and callers to these numbers may be assessed toll charges. Similarly, a customer who ports a wireless number to a wireline phone (and those customers who receive a number in a formerly wireless NPA-NXX because of pooling) will, as a side effect, receive reverse toll billing on their wireline phone. PRT believes this is inconsistent with Section 202 of the Communications Act and the Commission’s pooling and porting rules. In addition, we noted that a subsequent complaint filed at the Board by Centennial Puerto Rico Operations Corp. claims that the disparate treatment described above adversely affects Centennial’s clients and image.

If you have any questions, please do not hesitate to contact me.

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Ms. Marlene H. Dortch

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Sincerely,

/s/ Suzanne Yelen

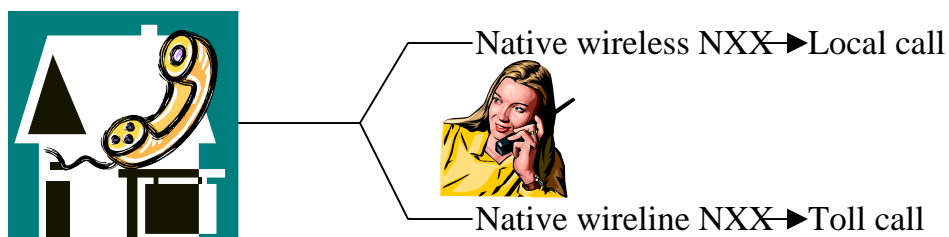
Suzanne Yelen

Enclosure

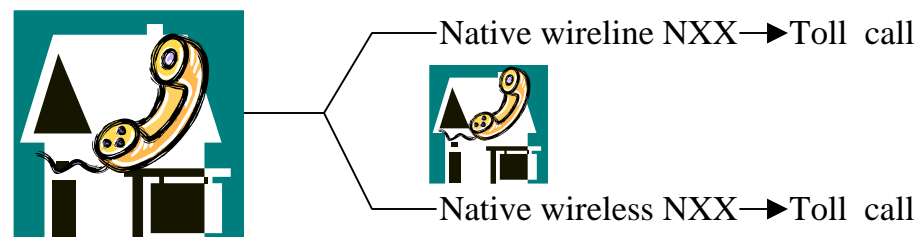
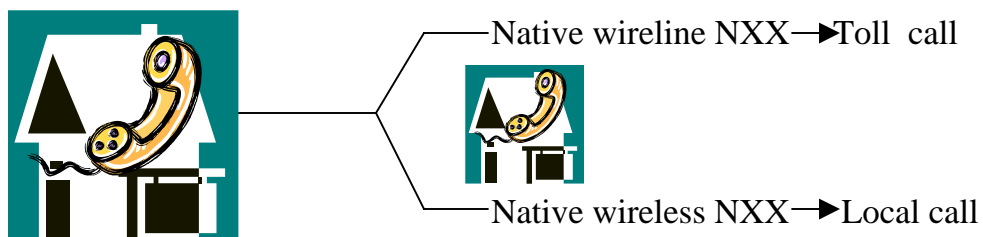
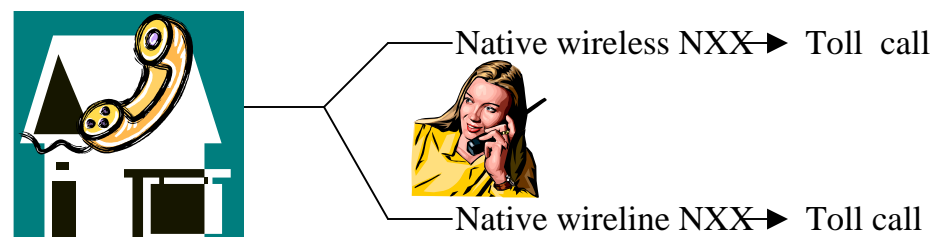
cc: Ms. C. Callahan
Ms. N. Jones
Ms. P. Slipakoff
Mr. J. Steinberg
Mr. S. Williams

PRT Call Charges in Puerto Rico With Numbering Pooling and Porting

Calls to Numbers in a Different Local Calling Area With Reverse Toll Billing



Calls to Numbers in a Different Local Calling Area Without Reverse Toll Billing



Native Wireless NXX – An NXX originally assigned to a wireless carrier

Native Wireline NXX – An NXX originally assigned to a wireline carrier